

Exhibit A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Petition of ACS of Anchorage, Inc. Pursuant to)
Section 10 of the Communications Act of 1934, as) WC Docket No. 05-281
Amended, for Forbearance from Sections 251(c)(3))
And 252(d)(1) in the Anchorage LEC Study Area)

STATEMENT OF KENNETH L. SPRAIN

1. I am currently the Senior Vice-President for Network and Information Technology for Alaska Communications Systems, including ACS of Anchorage, Inc. (“ACS”). I have held this position since 2003 and consulted for ACS during the prior two years. Before working as a consultant for ACS and other telecommunications companies, I was a Vice President at both CenturyTel and Pacific Telecom, Inc. (PTI). I began my career with the RCA Service Company working as a technician and supervisor at remote Alaskan communication sites and worked for over fifteen years in the Alaskan communications industry before transferring Stateside with PTI.

2. I am familiar with the Anchorage Study Area, the ACS network, the use of ACS’s network by competitors, and the existence of alternative networks in the Anchorage market.

3. As illustrated on the map attached as Exhibit A-1, the Anchorage LEC study area is comprised of five wire centers: Central, East, North, South and West. Although General Communication, Inc. (“GCI”) bases its analysis on “the seven largest wire centers,”¹ the

¹ *In the Matter of Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251(c)(3) and*

additional two “wire centers” it identifies are ACS “remote” locations on O’Malley and Rabbit Creek Roads, where GCI has elected to collocate its switch. GCI relies on the NECA Tariff F.C.C. No. 4, which identifies a number of “wire centers;” however, the remote locations (O’Malley, Rabbit Creek, Elmendorf, Ft. Richardson, Girdwood, and Indian) do not have the capability of a true end office. End users served from a remote location require a connection to a host switch at a central office to call outside of the area served by the remote. Neither interexchange carriers nor wireless carriers are interconnected at any remote location.

4. In addition to the wire center boundaries, the maps highlight the large business districts in Anchorage. As illustrated on the map, the North and Central wire centers have high concentrations of larger business locations. The North wire center includes downtown Anchorage, which is the largest business district and includes hotels, banks, offices for the railroad, port, and oil industries, and federal and state government offices. The Central wire center includes the second largest business district, “Midtown” Anchorage, which includes hotels, banks, offices for the oil industry, and municipal offices. ACS believes that GCI has fiber facilities in these areas. The West wire center includes the Anchorage airport. Schools, retail shopping, and restaurants are spread fairly evenly across all five wire centers, where growth has brought the entry of such businesses as “big box” stores and car dealerships. Many of the smaller businesses in Anchorage are located within residential areas, and thus should be passed by GCI’s cable facilities. The streets on the map show the developed areas of Anchorage. These developed areas appear to match the cable system boundaries that GCI identifies in Exhibit F of its Opposition. The areas south of Anchorage that are part of the South wire center (Girdwood,

252(d)(1) in the Anchorage LEC Study Area, Opposition of General Communication, Inc., WC Docket No. 05-281 (“Redacted Version”), at 15 (“GCI Opposition”).

Indian and Bird) are not within GCI's cable service area. These areas have low population densities and thus the cost of deploying facilities in these areas is relatively high. Eyecom offers cable service over its own cable network in these areas. Although Eyecom does not offer cable broadband service today, the technology is available in the market, and there is no reason to believe it could not offer broadband.

5. The maps also show the areas in the East wire center where GCI has exclusive facilities. ACS does not have its own facilities in developments on Elmendorf Airforce Base where GCI has its own copper facilities to supplement its cable facilities. ACS serves approximately 43 customers in these areas using resale of GCI's copper facilities.

6. The following tables provide ACS's access lines broken down by wire center for both business and residential customers. Access line numbers are based on the CASBB² numbers ACS reports to the Regulatory Commission of Alaska ("RCA").

As of November 30, 2005

Wire Center	Residential	Business	Total
Central	3,640	17,590	21,230
North	7,104	17,060	24,164
South	13,079	7,743	20,822
West	5,389	4,115	9,504
East	8,396	3,336	11,732
Total	37,608	49,844	87,452

As of December 31, 2005

Wire Center	Residential	Business	Total
Central	3,606	17,564	21,170
North	7,075	16,829	23,904

² The Carrier and Area Specific Bulk Bill is part of the state access charge scheme implemented at the outset of local exchange competition after competitive ILECs were ordered to exit the state access charge pooling process.

South	13,042	7,750	20,792
West	5,357	4,093	9,450
East	8,329	3,278	11,607
Total	37,409	49,514	86,923

These line counts include a small number of customers for whom ACS uses resold wireless services because deployment of wireline facilities is prohibitively expensive. As the carrier of last resort, ACS has plant that has been constructed to accommodate growth for which it receives no revenue. The line counts above do not reflect these unused facilities.

7. Due to the relatively small size of the Anchorage market and the nature of businesses in Anchorage, there is a low level of demand in the study area for capacity higher than DS1. ACS does not provision UNEs to GCI greater than DS1. Moreover, ACS provides DS3 service [BEGIN CONFIDENTIAL] [END CONFIDENTIAL].

8. If ACS's DS1 UNEs were no longer available to competitors in Anchorage, GCI and other competitors provide sufficient capacity to business customers using their own facilities as supplemented by ACS's tariffed offerings. For example, GCI can continue its practice of provisioning T-1 service by purchasing service via ACS's Metallic Service tariff and connecting that service to GCI's own T-1 electronics. The intrastate Metallic Service tariff rate is \$29 per month for a single pair.³ GCI's tariffed retail rate for T-1 service is \$89.24.⁴ Although a pair of Metallic Service lines are required to provide service, at a cost of \$58, GCI still has substantial margin opportunity with this method of provisioning. GCI could also provide DS1 capacity using HDSL on a single Metallic Service pair at an even higher profit margin.

³ See Exhibit A-2.

⁴ See Exhibit A-3.

9. Unlike residential customers, business customers require different levels of capacity. Additionally, higher capacity facilities typically entail more complicated installation procedures than are required for residential customers. Therefore, business customers typically experience longer wait times than residential customers for receiving new service. In 2005, only 35.6% of ACS's circuit orders were processed in 14 days or fewer. 57.3% of business customers' orders were processed between 15 and 30 days, and 7.1% took over 30 days from order receipt to installation.

Respectfully submitted,

/s/ Kenneth L. Sprain
Kenneth L. Sprain
600 Telephone Avenue
MS 60
Anchorage, AK 99503-6091

EXHIBIT A-1

Anchorage LEC Study Area Wire Center Map

1

2

3

4

5

A

B

C

D

E

F

POINT
MAC KENZIEMATANUSKA-SUSTITNA BOROUGH
MUNICIPALITY OF ANCHORAGEKnik
Arm

- ① ALASKA CENTER FOR THE PERFORMING ARTS
- ② ALASKA HERITAGE LIBRARY & MUSEUM
- ③ ALASKA JUNIOR THEATRE
- ④ AQUARIUM CHARTER SCHOOL
- ⑤ FRONTIER CHARTER SCHOOL
- ⑥ HOLY ROSARY ACADEMY
- ⑦ IMAGINIUM
- ⑧ TOM THUMB MONTESSORI SCHOOL
- ⑨ VILLAGE CHARTER SCHOOL
- ⑩ WILLIAM A. EGAN CIVIC & CONVENTION CENTER
- ⑪ VISITOR INFORMATION CENTER

EMMENDORF

R FORCE

BASE

ANCHORAGE

- ① Address Cir
- ② Adams Cir
- ③ Apple Cir
- ④ Carpenters Cir
- ⑤ Chandler Cir
- ⑥ Norton St
- ⑦ Homer Pl
- ⑧ Lagoon Cir
- ⑨ Malaga Cir
- ⑩ Milky Wy
- ⑪ Pribilof Dr
- ⑫ Sagan Cir
- ⑬ Shuttle Cir
- ⑭ Sir George Wilkins Ct
- ⑮ Starburst Cir
- ⑯ Stargate Cir
- ⑰ Umbarto Noble Cir
- ⑱ Word Pl

TED STEVENS
ANCHORAGE
INTERNATIONAL AIRPORTINT'L
TERMINALDOMESTIC
TERMINAL

WEST

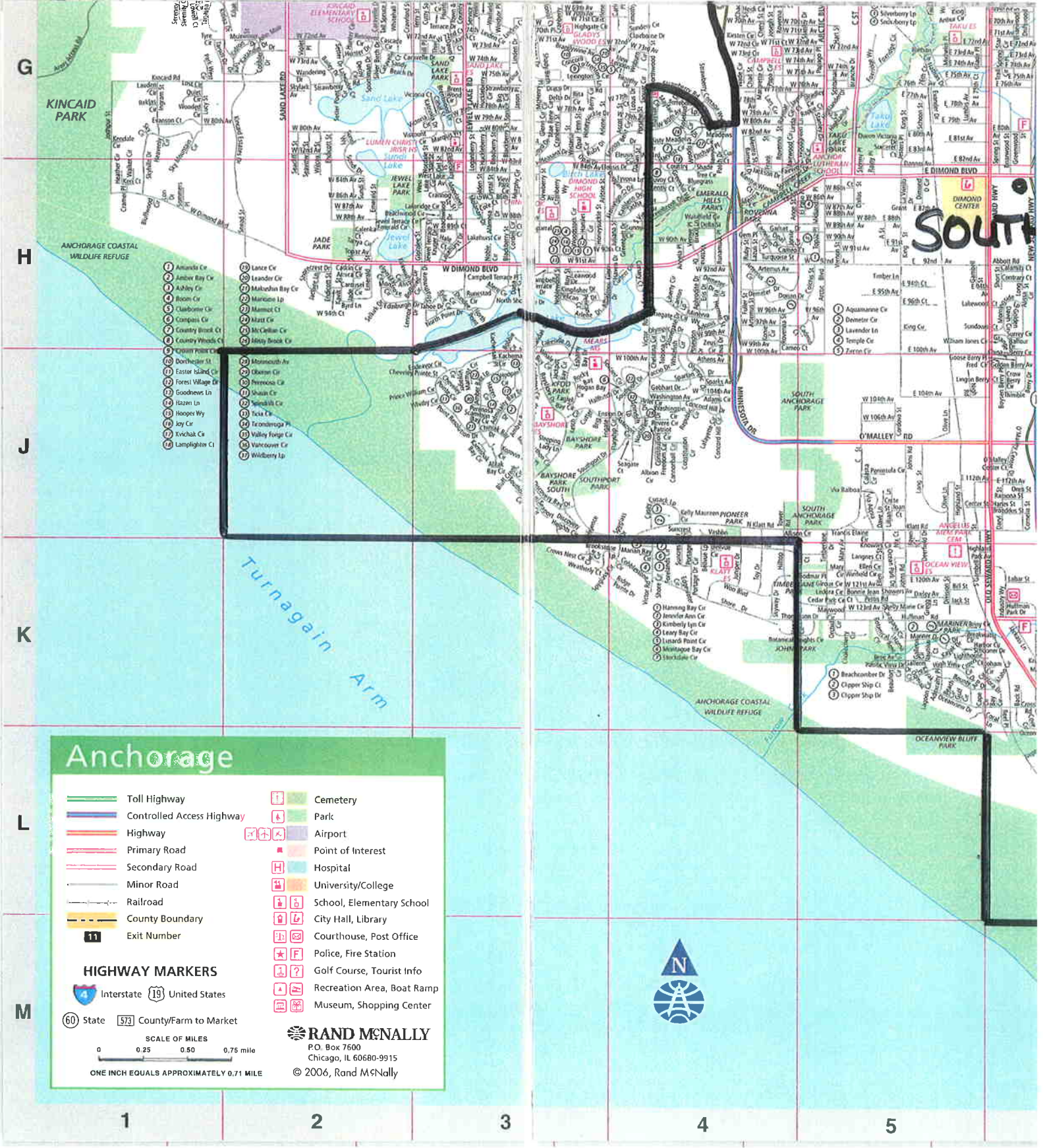
KULIS AIR NATIONAL
GUARD BASE

NORTH

CENTRAL

Spenard

CAMPBELL



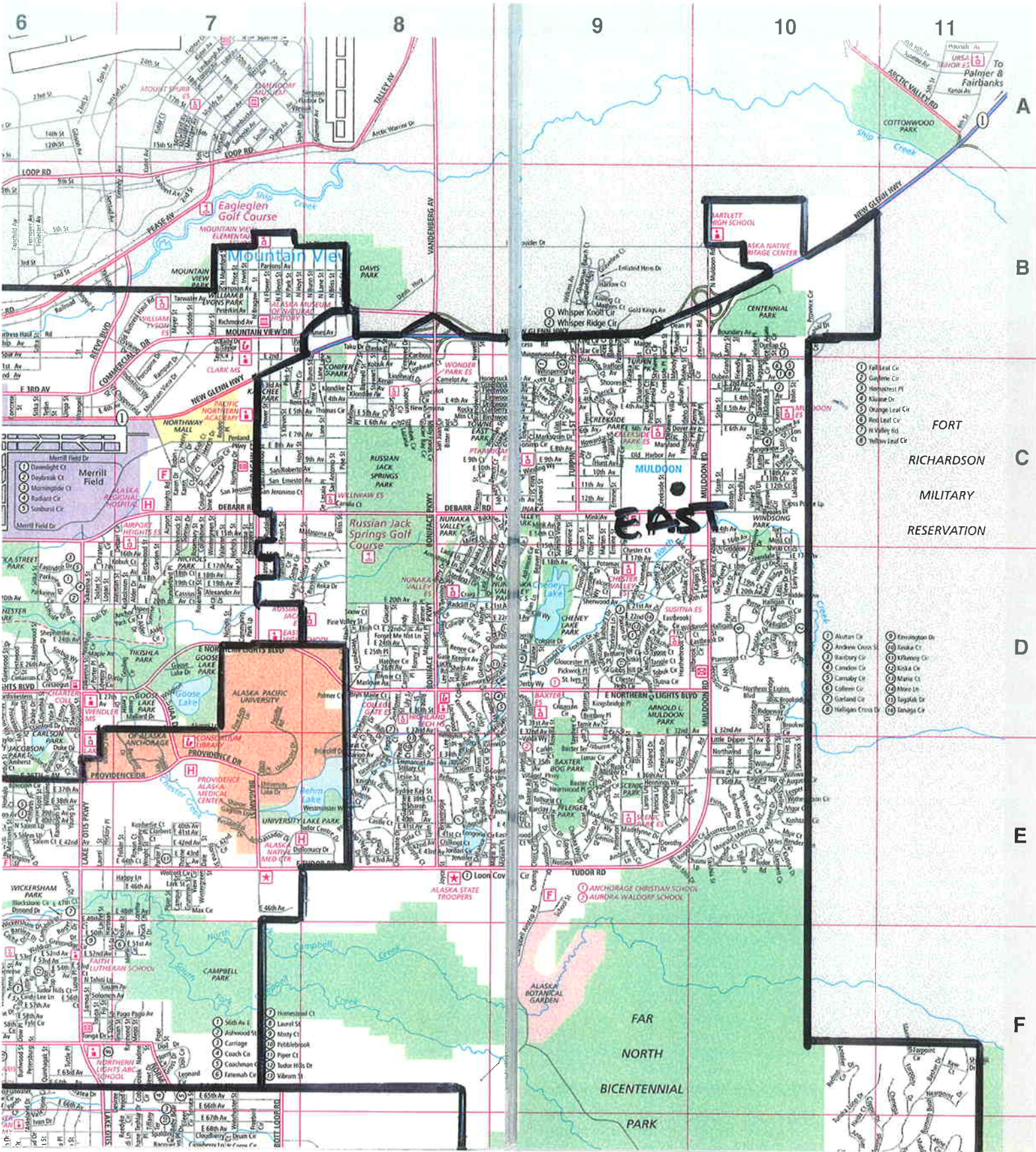
Anchorage

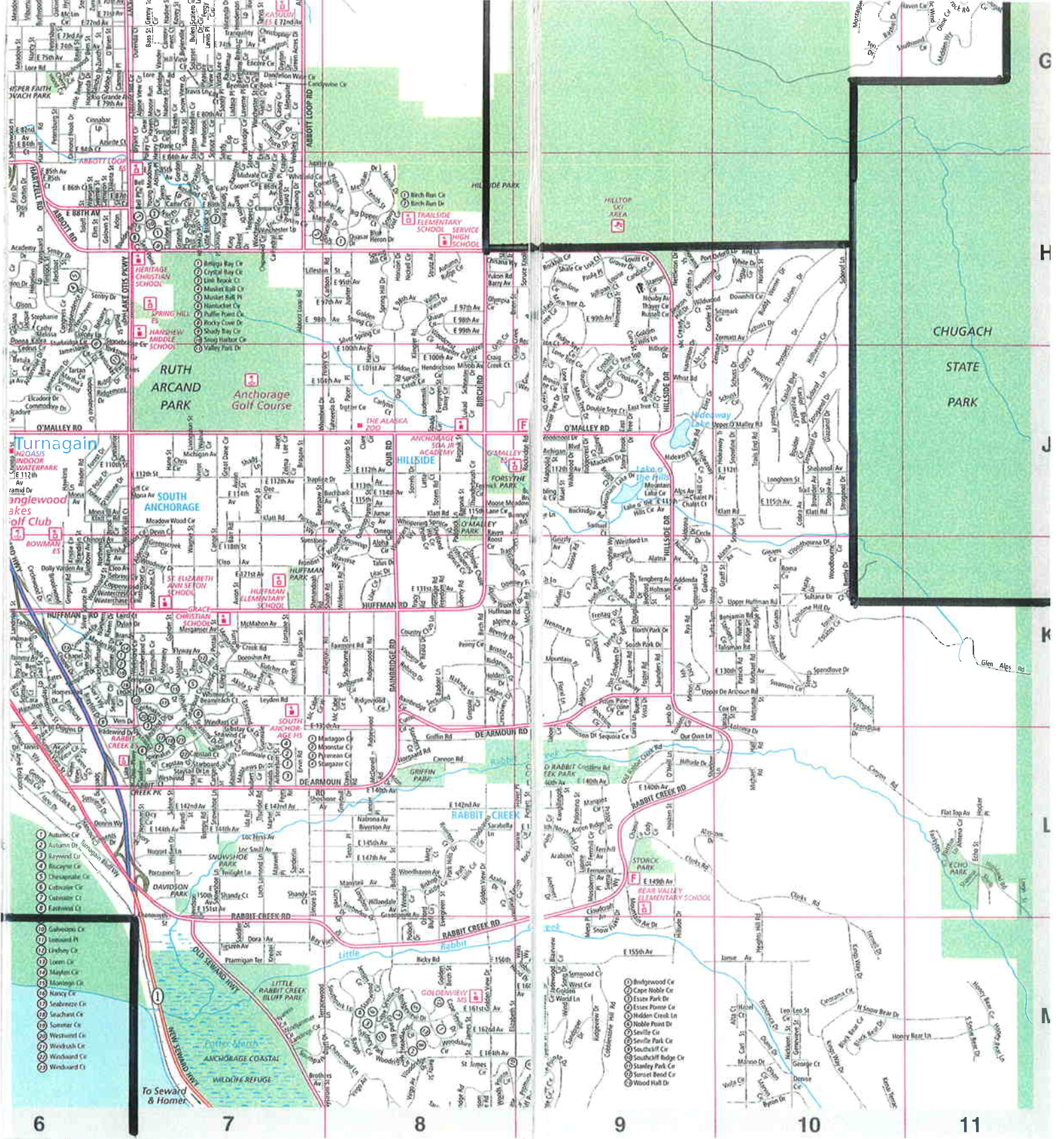
- | | | | |
|------------------------|---------------------------|--|----------------------------|
| | Toll Highway | | Cemetery |
| | Controlled Access Highway | | Park |
| | Highway | | Airport |
| | Primary Road | | Point of Interest |
| | Secondary Road | | Hospital |
| | Minor Road | | University/College |
| | Railroad | | School, Elementary School |
| | County Boundary | | City Hall, Library |
| | Exit Number | | Courthouse, Post Office |
| HIGHWAY MARKERS | | | Police, Fire Station |
| | Interstate 4 | | Golf Course, Tourist Info |
| | United States 19 | | Recreation Area, Boat Ramp |
| | State 60 | | Museum, Shopping Center |
| | County/Farm to Market 573 | | |

SCALE OF MILES
0 0.25 0.50 0.75 mile
ONE INCH EQUALS APPROXIMATELY 0.71 MILE

RAND McNALLY
P.O. Box 7600
Chicago, IL 60680-9915
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6

7

8

9

10

11

REDACTED FOR PUBLIC INSPECTION

*ACS Reply Comments
WC Docket No. 05-281
Sprain Statement
Filed February 23, 2006*

EXHIBIT A-2

Copy of ACS Tariff for Metallic Service



**Alaska
Communications
Systems**

ACS OF ANCHORAGE, INC.

(ACS-ANC)

RCA 120

LOCAL ACCESS TARIFF

RCA NO. 120
Canceling:

First Revised
Original

Sheet No.
Sheet No.

4.102
4.102

RCA APPROVED

ACS OF ANCHORAGE, INC.

4.5

PRIVATE LINE

4.5.2

VOICE GRADE SERVICE

(C)(L)*
(D)

Monthly
Rate

Non-
Recurring
Charge

4.5.2.1 RATES

4.5.2.1.1 Channel Termination Per Termination

\$29.00

\$214.90

4.5.2.1.1.1 Two-Wire Metallic

\$29.00

\$214.90

4.5.2.1.1.2 Two-Wire

\$57.50

\$214.90

4.5.2.1.1.3 Four-Wire

4.5.1.1.2 Channel Mileage

\$ -0-

4.5.1.1.2.1 Channel Mileage Facility Per Mile

\$ -0-

4.5.1.1.2.2 Channel Mileage Termination

(L)

4.5.2.1.3 Optional Features and Functions

4.5.2.1.3.1 Bridging

\$ 8.00

(I)

4.5.2.1.3.1.1 Voice/Data Bridging (two-wire)

\$ 8.00

(R)

4.5.2.1.3.1.2 Voice/Data Bridging (four-wire)

\$ 8.00

(R)

4.5.2.1.3.2 C-Conditioning (two & four-wire)

\$10.00

(R)

4.5.2.1.3.3 D-Conditioning (two & four-wire)

\$10.00

(R)

4.5.2.1.3.4 Signaling (two & four-wire)

(D)

4.5.2.1.4 Additional Engineering – Per Service Order

\$150.00

(N)

4.5.2.2 TERMS AND CONDITIONS

(N)

4.5.2.2.1 Terms and conditions in Section 4.5.1 apply to Voice Grade Service, where applicable.

4.5.2.2.2 A Voice Grade channel is a channel that provides voice frequency transmission capability in the normal frequency range of up 3000 Hz and may be terminated two-wire or four-wire. Voice Grade channels are provided between customer designated premises, or between a customer designated premises and a Company wire center or hubs.

4.5.2.2.3 Voice Grade services are typically used for voice and voice band data applications. Typical examples of voice grade circuits are alarm circuits, off-premise extensions, multipoint private line, voice trunk type, two-point voice grade data (one-way or simultaneous two-way), multipoint voice grade data, and voice grade telephoto or facsimile. These examples of applications are not intended to limit a customer's use of the channel nor to imply that the channel is limited to a particular use.

(D)(N)

(L)* Material relocated from First Revised Sheet No. 4.90.

Pursuant to U-01-034(30)
Tariff Advice 468-120

Effective

September 9, 2004

Issued By: ACS OF ANCHORAGE, INC.

By: _____
Ted Moninski

Title: Director, Regulatory Affairs

RCA NO. 120
Canceling:

Third Revised
Second Revised

Sheet No.
Sheet No.

4.189
4.189

RCA APPROVED

ACS OF ANCHORAGE, INC.

4.11	CONSTRUCTION SERVICES	
4.11.1	<u>LINE EXTENSION</u>	
4.11.1.1	RATES	Nonrecurring Charge
4.11.1.1.1	Line extension and addition within 1/2 mile of an existing line.	None
4.11.1.1.2	Line extension and addition beyond 1/2 mile of an existing line.	
4.11.1.1.2.1	Telephone line only - per section	\$579.35
4.11.1.1.2.2	Telephone/Electric line – per section	\$289.00
4.11.1.1.3	Single service pole on private property	None
4.11.1.1.4	Additional poles per pole (telephone only) *	\$145.15
4.11.1.1.5	Additional poles per pole (telephone/electric) *	\$72.60
	* Customer to provide necessary trimming for line.	
4.11.1.2	TERMS AND CONDITIONS**	
4.11.1.2.1	Line extension charges are applicable in connection with all classes, types and grades of service when established by means of an extension to the Utility's plant consisting of buried wire, pole construction or power line carrier and including extension by means of contact space on poles of others.	
4.11.1.2.2	All line extensions will be owned and maintained by the Utility. The applicant, however, if he so elects, may furnish and set the required poles in excess of the distance for which there is no charge in accordance with construction standards of the Utility in lieu of the charges applicable, but in all instances the Ownership of facilities shall be entirely vested in the Utility.	
4.11.1.2.3	Distances mentioned in this schedule are route distances. The routing of line extensions will be determined by the Utility.	
4.11.1.2.4	Should two customers request service requiring a line extension of more than one mile, each customer will share the cost equally. No rebate will be made to the First Revised customers should additional customers receive service from this line after it has been constructed.	

(D)
(D)

Pursuant to U-02-97(9)

Effective

March 15, 2004

Issued By: ACS OF ANCHORAGE, INC.

By: _____
Ted Moninski

Title: Director, Regulatory Affairs

RCA NO. 120
Canceling:

ORIGINAL

Sheet No.
Sheet No.

4.190

RCA APPROVED

ACS OF ANCHORAGE, INC.

4.11

CONSTRUCTION SERVICES

4.11.1

LINE EXTENSION

- 4.11.1.2.5 Line extension charges may be paid in a lump sum or when mutually agreeable in equal monthly installments for a term of two years.
- 4.11.1.2.6 When a customer on a project disconnects his service, no refund is made of the line extension charge.
- 4.11.1.2.7 On disconnection of service, those customers making monthly line extension charge payments are required to pay an amount equal to the total of the monthly line extension charge payment of the unexpired life of the contract.
- 4.11.1.2.8 Charges to remaining customers are not affected by disconnects.
- 4.11.1.2.9 When a customer disconnects service or moves off the project and service is established for a new applicant at the same location the new applicant may assume the line extension charge contract provided there is no lapse in payments.
- 4.11.1.2.10 Any adjustment in prepaid line extension charges is a matter for negotiation between the original customer and the new applicant.
- 4.11.1.2.11 A departure from the rates and special conditions specified in Section 6 may be made on behalf of the Utility when a line extension involves unusual or disproportionately large construction expenditures as compared with the usual types of plant construction.
- 4.11.1.2.12 As required by Section 4.11.2.2.5.3, ACS will require that the developer of a subdivision enter into a "Subdivision Agreement" with the Utility. The Subdivision Agreement will be in the form approved by the Regulatory Commission of Alaska in U-98-137(3). The Commission approved Subdivision Agreement form is incorporated herein by reference and may be obtained, upon request, from the Utility. The terms of the Subdivision Agreement will govern the installation of ACS's facilities in new or expanding subdivisions.

Tariff Advice 416-120

Effective

April 19, 2001

Issued By: ACS OF ANCHORAGE, INC.

By: _____
Ted Moninski

Title: Director, Regulatory Affairs

REDACTED FOR PUBLIC INSPECTION

*ACS Reply Comments
WC Docket No. 05-281
Sprain Statement
Filed February 23, 2006*

EXHIBIT A-3

Copy of GCI Tariff for T-1 Service

APUC No. 489 1" Revised Sheet No. 1

Cancelling

Original Sheet No. 1

RECEIVED

FEB 29 2000

State of Alaska
Regulatory Commission of Alaska

GCI Communication Corp.

GCI Communication Corp.

d/b/a General Communication, Inc., and d/b/a GCI

2550 Denali Street, Suite 1000
Anchorage, Alaska
99503

TARIFF FOR TELECOMMUNICATIONS SERVICE

CERTIFICATED AREA -Anchorage, Bird/Indian, Girdwood, Hope

(T)

T15N R3W Section: 24

R2W Sections: 10, 11, 14 through 23, NW 1/4 of 26; 27 through 33,
and W 1/2 of 34

T14N R3W Sections: 1, 2, 11 through 14, 24, 25 and 36
Sections: 3, 9, 10, 15, 16, 20 through 23, 26 through 29, and 31 through 35

R2W Sections: W 1/2 of 2; 3 through 10, W 1/2 of 11,
W 1/2 of 14 West of the Old Glenn Highway, 15 through 22,
W 1/2 of 23; 25 through 36

R1W Section: 31

T13N R5W Sections: 32 through 34

R4W Sections: 13, 20 through 29, 31 through 36

Pursuant to U-00-2 (3) _____

Effective Sept. 29, 2000 _____

Issued by: GCI Communication Corp.

By: _____

Title: Director, Rates & Tariffs

RCA No. 489 5th Revised Sheet No. 173

Canceling

4th Revised Sheet No. 173

RECEIVED

OCT 22 2004

State of Alaska
Regulatory Commission of Alaska

GCI Communication Corp.

8. PRIVATE LINE RATES – Anchorage, Bird/Indian, Girdwood, Hope

Tariff (C)

8.1 RATES AND CHARGES (Cont'd)

Reference (C)

8.1.3 HIGH CAPACITY SERVICE

5.6 (C)

Regulations concerning High Capacity Service are set forth in Section 5 preceding.

	<u>NRC</u>	<u>Monthly Rate</u>
(A) Channel Termination		
Per Termination		
- 1.544 Mbps	\$434.52	\$89.24
- 44.736 Mbps	\$368.25	\$1,894.03
(B) Channel Mileage		
(1) Channel Mileage Facility		
Per Mile		
- 1.544 Mbps		\$ 74.39
- 44.736 Mbps		\$178.96
(2) Channel Mileage Termination		
Per Termination		
- 1.544 Mbps		\$152.91
- 44.736 Mbps		\$348.38
(C) Optional Features and Functions		
(1) Automatic Loop Transfer	\$111.60	\$ 78.57
(2) DS3 to DS1 Multiplexing		\$ 355.29
(3) DS-1 to Voice Multiplexing		\$207.45
(4) DS-1 to Data Multiplexing		\$473.81

5.6.3

Tariff Advice No. 294

Effective: November 24, 2004

Issued by: GCI Communication Corp.

By: Jennifer K.G. Robertson

Title: Tariffs and Licenses Manager